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Attorneys for Defendant HCA Healthcare, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REGINA BAILEY, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

HCA, INC.

Defendant.

Case No. 2:21-cv-01740-RFB-BNW

**STIPULATION AND ORDER TO SET
ASIDE CLERK’S ENTRY OF DEFAULT
[ECF No. 23]**

Pursuant to LR 7-1, Plaintiff Regina Bailey (“Plaintiff”) and HCA Healthcare, Inc. (f/k/a HCA, Inc.) (“HCA” or “Defendant”) (jointly, the “Parties”) stipulate and agree as follows:

1. Plaintiff filed her Class Action Complaint on September 21, 2021. (ECF No. 1.)
2. On or about November 19, 2021, Plaintiff served the Class Action Complaint on Defendant. (ECF No. 2.)
3. Defendant did not respond to the Class Action Complaint on or before December 10, 2021.
4. On December 20, 2021, Plaintiff filed a Motion for Clerk’s Entry of Default. (ECF No. 20.)
5. Defendant appeared in this matter on January 7, 2022. (ECF No. 21.)
6. On January 12, 2022, the clerk entered a default against Defendant. (ECF No. 23.)

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7. The Parties stipulate that the clerk's entry of default against Defendant (ECF No. 23) be set aside.

8. Defendant shall have until January 17, 2022, to file an answer to the Class Action Complaint.

9. This stipulation is made in good faith and not for purposes of unduly delaying discovery or trial.

Dated this 12th day of January, 2022.

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY

JOSHUA M. DICKEY

PAUL C. WILLIAMS

Attorneys for Defendant HCA Healthcare, Inc.

Dated this 12th day of January, 2022.

THE CONSUMER PROTECTION FIRM, PLLC

By: /s/ Amanda J. Allen

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Attorneys for Plaintiff Regina Bailey

IT IS SO ORDERED.


RICHARD E. BOULWARE, II
United States District Court

DATED this 13th day of January, 2022.

Respectfully submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

DENNIS L. KENNEDY

JOSHUA M. DICKEY

PAUL C. WILLIAMS

Attorneys for Defendant HCA Healthcare, Inc.